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December 18, 2015

The Honorable Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street, Suite 660
New York, New York 10007

Re: Hecklerco, LLC v. Yuuzoo Corporation Limited, et. al.
Civil Action No. 15-cv-5779 (VM)

Dear Judge Marrero:

We represent plaintiffs in the above referenced matter. Pursuant to the Court's Rules Paragraph II. A., we hereby request a pre-motion conference in connection with a motion for leave to amend the Complaint. We have attached a copy of our proposed amended complaint hereto.

On July 22, 2015, Plaintiffs filed its Complaint against the following defendants:

- Defendant Macquarie Capital Securities Singapore Pte Limited ("Macquarie");
- Defendants Yuuzoo Corporation Limited, Yuuzoo Corporation and Thomas Zilliacus ("Yuuzoo Defendants");
- Defendants Marc Cramer- Roberts, YZ International, Inc., Yuuu Pty Ltd., Ron Creevey and Danielle Creevey (the "Yuu Defendants"); and
- Defendants John Hoekman and Wells Fargo Advisors, LLC (the "WF Defendants").

On September 15, 2015, each of the WF Defendants appeared and filed their respective Answers.

Service of process has been completed on defendants Yuuu Pty Ltd., and Danielle Creevey, Ron Creevey on September 30, 2015, October 1, 2015 and November 9, 2015 respectively, however, they are yet to appear. Service on Marc Cramer-Roberts in the United Kingdom has not been completed.

In lieu of filing motions to dismiss, Macquarie and the Yuuzoo Defendants sent pre-motion letters raising their arguments. We have agreed to dismiss Defendant MacQuarie without

prejudice. We advised the Yuuzoo Defendants that we would be filing an amended complaint as of right.

In repleading the claims against the Yuuzoo Defendants with more particularity we have also had to amend the pleading as to the WF Defendants. While we are permitted to amend as of right as to the Yuuzoo Defendants and Yuuu Defendants, since the WF Defendants have answered we are requesting leave to amend the Complaint with respect to the WF Defendants.

Furthermore, we are seeking leave to add additional defendants, an Australian and a U.K. company both of which are named Moment Media Pty Ltd. These companies are successors in interest of Defendant YZ International Inc., a dissolved U.S. corporation which we have been unable to serve.

We respectfully submit that amendment is appropriate and is consistent with the practice of liberally granting motions to amend where an additional party is to be named and in order to plead with more particularity pursuant to FRCP Rule 9(b).

Plaintiffs have not previously made any similar requests in this case.

Lastly, if the Court or any opposing counsel would like a marked copy of the Amended Complaint reflecting the changes made, Plaintiffs will provide.

Respectfully submitted,



Ken Sussmane

cc: Marc Weingard (via ECF)
Chris Paparella (via ECF)
Toby S. Soli (via ECF)
Edward W. Larkin (via ECF)